

REMARKS

Claims 1-27 are pending in this application. Claims 28-51 were previously cancelled as being directed to a non-elected invention and are now included in a separate divisional application. Claims 1, 8, and 22 have been amended by this Amendment.

The Office Action dated February 7, 2006 rejected claims 1-13 and 22-27 as being obvious in view of the prior art. Applicants gratefully acknowledge the indication that claims 14-21 are allowable.

Claims 1 and 22

The grounds for the obviousness rejection of claims 1 and 22 is set forth in part 2 on pages 2-3 of the Office Action. Specifically, the rejection asserts that claims 1 and 22 are rendered obvious by the embodiment described in Published Patent Application No. 2002/0058501 by Hannu et al (this embodiment hereinafter referred to simply as "Hannu"). Applicants respectfully traverse the rejection at least because it does not establish a prima facie case that Hannu suggests each and every one of the combination of features recited in the claims or that the Hannu published patent application is prior art.

Independent claim 1 is directed to a method for providing wireless communication and recites the limitations of "storing persistently signaling messages specific to a profile for a specific mobile station or user of a mobile station in a dictionary..." Independent claim 22 is directed to a station for providing wireless communication and recites substantially the same limitations.

Without any citation of, or reliance on, a secondary reference, the rejection alleges that "the claimed limitations regarding a 'profile' are made obvious by Hannu." Specifically, the rejection asserts "since each mobile station would have different dictionaries dedicated its messages" (sic), and "since these messages would comprise information at least related to the user of this particular mobile station, it is clear that these messages would obviously comprise information at least specific to a 'profile' for a specific mobile station or at least specific to the user of the mobile station."

The rejection is unclear and confusing in several respects. First of all, there are two dictionaries in Hannu and the same dictionaries are in each of the stations. There is a static dictionary (SD) 330 and a dynamic dictionary (DD) 335. The static dictionary (SD) 330 is predefined and is known at each communicating entity. See, for example, paragraph 0033 of the published patent application. It thus appears that the two entities have the same static dictionary, and not different static dictionaries. Moreover, static dictionary (SD) 330 is predefined and not specific to the mobile station or to a user of the mobile station, and cannot be specific to a profile therefore as recited in claim 1.

The dynamic dictionary (DD) 335 in Hannu is updated during a communication session, and used as a dictionary for subsequent compression and decompression operations between the two stations. See, for example, paragraph 0034 of the published patent application. There is no indication that the dynamic dictionary (DD) 35 in each station is different. Dynamic dictionary (DD) 35 is built up using the same messages, M1-M5, passed between the stations. See, for example, Fig. 4 and paragraphs 0044 to 0048 of the published patent application.

The rejection asserts that "it is clear that these messages would obviously comprise information at least specific to a 'profile' for a specific mobile station or at least specific to the user of the mobile station." However, applicants can find no indication that any of the messages M1-M5 contain information specific to a mobile station or to a user of the mobile station. The obviousness rejection fails to cite or apply a secondary reference to support the assertion. As such, the rejection fails to establish a prima facie case of obviousness.

Secondly, applicants respectfully submit that the rejection does not establish a prima facie case that the Hannu published patent application is prior art against this application. The March 21, 2001 filing date of the Hannu published patent application is not before the duly claimed priority dates of this application. Although the Hannu published patent application does refer to a prior provisional application, the rejection does not establish that the provisional application includes the disclosure of the Hannu published patent application.

Claims 2-5, 7-11 and 13

The grounds for the obviousness rejection of claims 2-5, 7-11 and 13 are set forth in part 3 on pages 3-5 of the Office Action. Specifically, the rejection asserts that the claims are obvious over Hannu in view of U.S. Patent No. 6,085,069 issued to Sharpe. Applicants respectfully traverse the rejection at least because it fails to establish a prima facie case that the applied references suggest each and every one of the combination of features recited in the rejected claims.

Claim 2 is dependent on claim 1 and additionally recites that the profile-specific information stored persistently in the profile specific dictionary comprises mobile station or network station information. The rejection states that since "the protocol and identities of the device and network, inherently included in the header of a message, would obviously be one of most 'frequently used items' in a message, it is clear that the dictionary would obviously store identities as a useful string for message compression in a similar way as disclosed by Sharpe (see col. 6, lines 20-59 regarding most 'frequently used items')." With respect to the allegation of inherency, applicants can find no indication that mobile station or network station information is necessarily included in messages M1-M5 of Hannu. The rejection is based on conjecture and does not provide any support showing that the recited features are inherent in Sharpe.

The rejection further asserts that it would have been obvious to "incorporate the above teaching of Sharpe to Hannu to include the most frequently used device information such as device and network identifiers in a dictionary, for improving the compression ratio of the message." The rejection does not point to any portion of either reference as providing motivation to combine the references in the manner that is evidently being proposed in the rejection. There appears to be no reason to do so except the hindsight provided by this application.

Claims 6, 12 and 27

The grounds for the obviousness rejection of claims 6, 12 and 27 are set forth in part 4 on page 5 of the Office Action. Specifically, the rejection asserts that the claims are rendered obvious by Hannu in view of European Patent Publication No. 0933876A1 filed by Bellovin. Applicants respectfully traverse the rejection because it fails to establish a prima facie case that

the applied references suggest each and every one of the combination of features recited in the claims.

The rejection asserts that Bellovin discloses "a data compression method for packet transmission, wherein a plurality of static dictionaries are used, wherein one of the static dictionary comprise protocol-specific information (see col. 5, lines 1-9)." In Bellovin, a fixed compression dictionary is sent by a first station to a second station during the start up of a communications session. The dictionary is based on the data type to be employed in the communication session. In Bellovin, the first station sending the setup message determines the dictionary to be used.

The Office Action asserts that "it would have been obvious to one skilled in the art to further incorporate Bellovin's teaching to Hannu to provide a protocol-specific information in a static dictionary as claimed, for further improving the compression ratio of the communication signal." The rejection does not point to any part of any reference as teaching the proposed modification, and the assertion is unsupported by any of the applied prior art. In particular, it is erroneous to state that the Bellovin patent teaches that Hannu should be modified. Hannu is a very specific method of data compression for wireless packet transmission that is stated to improve the compression ratio of the communication signal.

Claim Amendments

Notwithstanding the above reasons set forth in traversing the outstanding rejections, applicants have amended the claims to provide clarification of the claimed invention. Specifically, independent claims 1, 8, and 22 are amended to recite that the profile specific dictionary is "arranged to retain at least some of the stored messages for use during subsequent communication sessions." Exemplary, non-limiting, support for these amendments can be found at, for example, page 12, lines 6-12, and page 20, lines 6-12, of the originally filed specification. According to the amended claims, the profile-specific dictionary can be accumulated dynamically and retained across subsequent communication sessions, which provides better compression performance than where the dynamic dictionary is cleared after each session.

This feature is not suggested by the applied references. In Hannu, dynamic dictionary (DD) 335 is empty at the beginning of each communication session and is cleared after each

communication session. See, for example, Fig. 4 and paragraphs 0044 to 0048 of the published patent application. The first message, M1, in a communication session is compressed using only the static dictionary. If the dynamic dictionary was not empty at the beginning of a communication session, it could also be used to compress the first message since that would improve performance. If the dynamic dictionary was not cleared at the end of a communication session, it would not be empty at the beginning of the next communication session. The dynamic dictionary (DD) 35 in Hannu is cleared at the end of each communication session and has to be built up again at each new session. Therefore, the rejection fails to establish that Hannu retains accumulated information in a profile-specific way across subsequent communication sessions, as recited in the amended claims.

Conclusion

Applicants submit that the claims are allowable over the cited prior art for at least the reasons set forth above. Applicants respectfully request the mailing of a Notice of Allowance.

The Commissioner is hereby authorized to charge the extension fee and any other fees necessary for the consideration of this paper, or to credit any overpayment, to the undersigned attorney's Deposit Account No. 10-0100 (Atty. Docket NOKIA.5006US).

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Robert M. Bauer', is written over a horizontal line.

Robert M. Bauer, Reg. No. 34,487
LACKENBACH SIEGEL, LLP
One Chase Road
Scarsdale, NY 10583
Telephone: (914) 723-4300
Facsimile: (914) 723-4301
Email: RBAUER@LSLLP.COM